

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 19-CR-03113 JB

LUIS SANCHEZ,

Defendant.

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, Luis Sanchez, through his attorney the Esquibel Law Firm, PA (Diego R. Esquibel), hereby moves for the Court to slightly modify the conditions of his release set by the Court. As grounds the defendant Luis Sanchez or therefore, states:

1. After being released by the Court on October 10, Mr. Sanchez has resided at La Pasada Halfway house under the conditions set by the Court. (Doc. 919).
2. Since his release Mr. Sanchez has followed his conditions and has thus far remained compliant with those requirements set by the Court. To date Mr. Sanchez has completed the requirements of the Court.
3. Mr. Sanchez's time in La Pasada has limited his job opportunities and kept him away from his young son and his partner.
4. Based on Mr. Sanchez's success pretrial is not opposed with a modification of the Courts October 10 Order on conditions of release to allow Mr. Sanchez to return to his home.
5. Elaine Rameriez has been contacted and takes no position on the modification of the Conditions of Release to allow Mr. Sanchez to return to his home with the remaining conditions of release.

WHEREFORE, Luis Sanchez through his undersigned counsel, respectfully request that the Court modify its Orders allowing for the change of residence.

Respectfully Submitted By:

The Esquibel Law Firm, P.A.

/s/ *Diego R. Esquibel*

Diego R. Esquibel

Attorney for Defendant Luis Sanchez

1911 Wyoming Blvd. NE

Albuquerque, NM 87112

(505) 275-3200

I HEREBY CERTIFY THAT on November 10, 2024 I filed the foregoing electronically through the CM/ECF system, which caused all parties to be served by electronic means.

/s/ *Diego R. Esquibel*

Approved by: Officer Robert Vigil